Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York Jennifer L. Brown Attorney-in-Charge

December 29, 2020

BY EMAIL & ECF

MEMO ENDORSED

Honorable Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Hai Jiao Dai,

19 Cr. 710 (SHS)

Dear Judge Stein:

I write to respectfully request a 45-day adjournment of Hai Jiao Dai's sentencing proceeding, currently scheduled for January 14, 2021, without objection from the government. An adjournment is appropriate in light of Chief Judge Colleen McMahon's Standing Order suspending all in-person proceedings in the Southern District of New York through (at least) January 15, 2021 (see In re Coronavirus/COVID 19 Pandemic, 20-mc-00622-CM (S.D.N.Y. Nov. 30, 2020)), and the defense's need for additional time to prepare for sentencing. This includes the additional time necessary for the defense to have the final Pre-Sentence Report, which was issued today, translated into Mandarin.

The sentencing is adjourned to March 8, 2021, at 10:00 a.m. Defense submissions are due by February 8, 2021, the government submissions are due by February 22, 2021

Andrew J. Dalack

Assistant Federal Defender

(212) 417-8768

Counsel for Hai Jiao Dai

Respectfully Submitted,

Dated: New York, New York December 30, 2020

> SIDNEY H. STEIN U.S.D.J.

SO ORDERED